



# California Regional Water Quality Control Board

## Santa Ana Region



Alan C. Lloyd, Ph.D.  
Agency Secretary

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Arnold Schwarzenegger  
Governor

August 10, 2005

Base Realignment and Closure  
Attn: Mr. F. Andrew Piszkin, P.E.  
BRAC Environmental Coordinator  
7040 Trabuco Road  
Irvine, California 92618

### COMMENTS ON DRAFT FEASIBILITY STUDY ADDENDUM, OPERABLE UNIT 2B, IRP SITE 2 GROUNDWATER, FORMER MARINE CORPS AIR STATION, EL TORO, SWRCB GEOTRACKER GLOBAL ID: DOD100131200

Dear Mr. Piszkin:

We have reviewed the above referenced document, dated March 2005, which we received on March 29, 2005. We have the following comments:

- **Appendix B, B1.3.1 General Approach to Requirements of the Federal Resource Conservation and Recovery Act, Page B1-6:** Site 2 is an inactive landfill in remediation and corrective action monitoring status. The Navy is proposing to construct the final cover at this site in the near future. It is essentially a municipal solid waste landfill or waste management unit, with a minor portion of industrial waste and an even smaller portion of waste that would now be classified as hazardous, if this were a new or active landfill.

Landfill Site 2 at MCAS El Toro is not being closed as a hazardous waste landfill or unit. It is considered a municipal solid waste landfill.

The federal regulations for municipal solid waste landfills are specified in the Resource Conservation and Recovery Act (RCRA): Title 40, Code of Federal Regulations (40 CFR), Part 258 (commonly referred to as RCRA Subtitle D). California is an authorized State for administering RCRA Subtitle D. Therefore, the State's regulations for municipal solid waste are to be utilized in determining the applicable or relevant and appropriate requirements (ARARs) for response to contaminant releases from IRP Site 2 landfill. California's regulations for municipal solid waste landfills (i.e. non-hazardous solid waste) are specified in Title 27 of the California Code of Regulations (27 CCR).

You have consistently selected the State's hazardous waste regulations (22 CCR) when addressing release(s) from non-hazardous waste landfills as the controlling

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State ARARs. In your analysis of ARARs for this site, where you have identified 22 CCR regulations, we request that you make the appropriate revisions to incorporate the correct references to 27 CCR.

- **B2.2.1.2 State**, Page B2-5, 5<sup>th</sup> bullet: In 1997, the California regulations cited in 23 CCR were moved, along with regulations for discharges of solid waste, to 27 CCR. Former 23 CCR § 2550(a) is now located in 27 CCR § 20380. Former 23 CCR § 2550.4 is now located in 27 CCR § 20400. Former 23 CCR § 2550.5 is now located in 27 CCR § 20415.
- You have not identified 27 CCR § 20240 (c) as an ARAR for Site 2. This regulation requires maintaining a five-foot separation between waste and underlying groundwater. The requirement pertains to all existing solid waste landfill units, including Site 2. The base of the waste must be a minimum of five feet above the highest anticipated elevation of underlying groundwater. Please include this regulatory requirement in your evaluation.
- **Comprehensive Water Quality Control Plan for Santa Ana Region (Basin Plan)**, Page B2-7, second and third paragraphs: These paragraphs identify the Basin Plan as establishing beneficial uses and water quality objectives for the "Irvine Forebay I groundwater subbasin." The Basin Plan was amended by Regional Board Resolution No. R8-2004-0001 to incorporate an updated Total Dissolved Solids (TDS) and Nitrogen Management Plan for the Santa Ana Region. The amended Basin Plan includes revisions to the groundwater subbasin boundaries and nomenclature, the TDS and nitrate-nitrogen water quality objectives, and the TDS and nitrogen wasteload allocations. The amended Basin Plan also contains revisions to the reach designations and the TDS and nitrogen objectives, and specifies the beneficial uses for specific surface water in the Santa Ana Region. However, the beneficial uses you have identified for groundwater were not revised. Please revise the term "Irvine Forebay I groundwater subbasin" to Irvine Groundwater Management Zone. The water quality objectives for TDS and nitrate have been revised. The water quality objectives for hardness, sodium, chloride, and sulfate are no longer applicable.
- **California Code of Regulations, Title 23, div. 3, ch 15, §§ 2550(a), 2550.4(d), (e), and (f).** Please refer to our first and second comments above, and make the necessary revisions.



Mr. F. Andrew Piszkin, P.E.

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August 10, 2005

For any questions, please call me at (951) 782-4494, or send email to [jbroderick@waterboards.ca.gov](mailto:jbroderick@waterboards.ca.gov).

Sincerely,

  
John Broderick  
SLIC/DoD Section

cc via email: Mr. Richard Muza, US EPA, Region 9  
Mr. Frank Cheng, DTSC, Office of Military Facilities  
Mr. Gordon Brown, NAVFACENGCOM, Southwest Division

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